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7 Attorneys for Defendant  
TESLA, INC.

8  
9 *[Additional Counsel Listed on the*  
10 *Next Page]*

11 UNITED STATES DISTRICT COURT  
12 CENTRAL DISTRICT OF CALIFORNIA

13  
14 ROCIO JUAREZ RUIZ, individually, and  
on behalf of all others similarly situated,

15 Plaintiff,

16 vs.

17 TESLA, INC., a Delaware corporation  
18 d/b/a TESLA MOTORS, INC.;  
ATLANTIC SOLUTIONS GROUP INC.,  
19 a Delaware corporation; and DOES 1  
through 10, inclusive,

20 Defendants.  
21

Case No. 5:22-cv-00693 FMO (KKx)

**STIPULATION TO CORRECT  
SEPTEMBER 19, 2022 ORDER  
PURSUANT TO FEDERAL  
RULES OF CIVIL PROCEDURE,  
RULE 60(A)**

Complaint filed: November 22, 2021  
Trial date: Not set

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12 Attorneys for Defendant  
13 ATLANTIC SOLUTIONS GROUP INC.  
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1 This Stipulation to Correct the Court’s September 19, 2022 Order Pursuant to  
2 Federal Rules of Civil Procedure, Rule 60(a) is made by and between Plaintiff  
3 Rocio Juarez Ruiz (“Plaintiff”), Defendant Tesla, Inc. d/b/a Tesla Motors, Inc.  
4 (“Tesla”), and Defendant Atlantic Solutions Group Inc. (“Atlantic Solutions”), by  
5 and through their respective undersigned counsel of record, based upon the  
6 following facts:

7 WHEREAS, on November 22, 2021, Plaintiff filed a class action complaint  
8 in this action against Defendant alleging violations of California law for: (1)  
9 failure to pay minimum and straight time wages; (2) failure to pay overtime  
10 wages; (3) failure to provide meal periods, (4) failure to authorize and permit rest  
11 periods, (5) failure to timely pay final wages at termination, (6) failure to provide  
12 accurate itemized wage statements, and (7) unfair business practices;

13 WHEREAS, on March 11, 2021, Plaintiff filed a First Amended Complaint  
14 adding an additional cause of action for civil penalties under California’s Private  
15 Attorneys General Act of 2004 (“PAGA”);

16 WHEREAS, on April 22, 2022, Defendants removed this case to federal  
17 court under the Class Action Fairness Act, 28 U.S.C. § 1332(d)(2);

18 WHEREAS, Plaintiff sought to file a Second Amended Complaint in this  
19 Court;

20 WHEREAS, the Parties previously conferred, and agreed that, subject to  
21 Court approval, Plaintiff should be permitted to file the Second Amended  
22 Complaint, which includes claims only under PAGA;

23 WHEREAS, on September 16, 2022, the Parties filed a Joint Stipulation  
24 and Proposed Order requesting leave for Plaintiff to file the Second Amended  
25 Complaint;

26 WHEREAS, the Joint Stipulation correctly provided that “Defendants shall  
27 file a response to the Second Amended Complaint within 30 days of its filing”;

1 WHEREAS, the Proposed Order that was submitted with this filing  
2 inadvertently and incorrectly stated that “Defendants’ response to the Second  
3 Amended Complaint shall be due within 30 days of the filing of the *First*  
4 Amended Complaint” (emphasis added);

5 WHEREAS, the Parties intended that, consistent with the Joint Stipulation,  
6 the Proposed Order would provide that “Defendants’ response to the Second  
7 Amended Complaint shall be due within 30 days of the filing of the *Second*  
8 Amended Complaint” (emphasis added);

9 WHEREAS, on September 19, 2022, the Court granted the Parties’ Joint  
10 Stipulation and adopted the Proposed Order, which contained this typographical  
11 error;

12 WHEREAS, pursuant to Federal Rule of Civil Procedure (“FRCP”), Rule  
13 60(a), the Parties wish to correct this typographical error in the September 19,  
14 2022 Order, and change the word “First” to “Second” consistent with the Parties’  
15 intended language and the language provided in the corresponding Joint  
16 Stipulation;

17 NOW, IT IS HEREBY STIPULATED AND AGREED, by and through the  
18 Parties’ respective counsel as follows:

19 The September 19, 2020 Order, which reads “Defendants’ response to the  
20 Second Amended Complaint shall be due within 30 days of the filing of the First  
21 Amended Complaint” shall be corrected to read “Defendants’ response to the  
22 Second Amended Complaint shall be due within 30 days of the filing of the  
23 *Second* Amended Complaint”.

1 Dated: September 22, 2022

MORGAN, LEWIS & BOCKIUS LLP

2 By: /s/ Brian D. Berry

3 Brian D. Berry  
4 Andrea Fellion  
5 Kassia Stephenson

6 Attorneys for Defendant  
7 TESLA, INC.

8 Dated: September 22, 2022

MOON & YANG, APC

9 By: /s/ Enzo Nabiev

10 Kane Moon  
11 Allen Feghali  
12 Enzo Nabiev

13 Attorneys for Plaintiff  
14 ROCIO JUAREZ RUIZ

15 Dated: September 22, 2022

AFFELD GRIVAKES LLP

16 By: /s/ Damion Robinson

17 Damion Robinson

18 Attorneys for Defendant  
19 ATLANTIC SOLUTIONS GROUP INC.

**ATTESTATION**

I, Brian D. Berry, attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

Dated: September 22, 2022

MORGAN LEWIS & BOCKIUS LLP

By: /s/ Brian D. Berry  
Brian D. Berry